

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
ABSHIR MOHAMMED AHMED,)
)
Defendant.)

CR 13-09 RHK

INFORMATION

(18 U.S.C. § 1347)

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT 1

(Health Care Fraud)

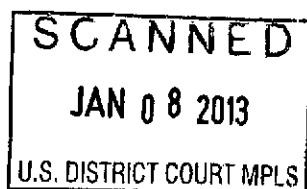
1. From in or about January 2008, to in or about June 2011, in the State and District of Minnesota, the defendant,

ABSHIR MOHAMMED AHMED,

did knowingly and willfully execute a scheme to defraud Medicaid, a health care benefit program, and to obtain money owned by and under the custody and care of Medicaid, namely over \$400,000 of Medicaid funds, by means of materially false and fraudulent pretenses, representations, and promises, in connection with the delivery of and payment for health care services, in violation of Title 18, United States Code, Section 1347.

2. The scheme to defraud the Medicaid program included defendant knowingly and willfully billing Medicaid for home health care services purportedly provided by identified Personal Care Assistants ("PCA") that were not in fact provided by those PCAs.

3. For example, on or about July 16, 2009, AHMED knowingly billed Medicaid \$1,330.56 for PCA services allegedly, but not



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actually, provided by A.N., a known adult male, to S.H., a known adult male.

4. All in violation of Title 18, United States Code, Section 1347.

Forfeiture Allegations

5. Count 1 of this Information is hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(7).

6. As the result of the offense alleged in Count 1 of this Information, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 982(a)(7), any property, real or personal, that constitutes or is derived from proceeds traceable to the violations of Title 18, United States Code, Sections 1347, or that was used to facilitate, or was intended to be used to facilitate, the commission of the violations.

7. If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

8. All in violation of Title 18, United States Code,
Sections 1347 and 982(a)(7).

Dated: January 8, 2013

Respectfully submitted,

B. TODD JONES
United States Attorney

A handwritten signature in black ink, appearing to read 'D. Genrich', with a stylized flourish extending to the right.

BY: DAVID M. GENRICH
Assistant U.S. Attorney